



JEANA CHAIRESS CPT

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

WILLIAM RAY SPRAY, JR., and)
RHONDA JEAN SPRAY, Individually)
and as Personal Representatives)
of the ESTATE OF SINDI LUCILLE)
SPRAY, Deceased,)
Plaintiff(s),)
-vs-) Case No. CIV-20-1252-C
BOARD OF COUNTY COMMISSIONERS)
OF OKLAHOMA COUNTY, in its)
Official Capacity as Governing)
Body of the County of Oklahoma)
County,)
Defendant(s).)

DEPOSITION OF JEANA MARIE CHAIRESS, CPT

TAKEN ON BEHALF OF THE PLAINTIFF(S)

IN OKLAHOMA CITY, OKLAHOMA

ON SEPTEMBER 21, 2022

REPORTED BY: LESLIE A. FOSTER, RPR

Page 1

JEANA CHAIRESS CPT

1 Exhibit 11, did you create anything else?

2 **A** No, sir.

3 **Q** On your report, Exhibit 11, I noted this on
4 many of the reports. Do you see where it says "Did
5 injury occur?"

6 **A** Yes.

7 **Q** It says "No." That's not really accurate, is
8 it?

9 **A** No.

10 **Q** And where it says "Were there any witnesses,"
11 and it says "No," that's not really accurate, is it?

12 **A** No.

13 **Q** And when it says "Was there any evidence," and
14 it says "No," that's not really accurate, is it?

15 **A** I mean, it could go both ways. I mean, if
16 there wasn't anything found, there wouldn't be evidence.
17 It depends on how you -- I mean, but, no.

18 **Q** Are those just preset on the template before
19 you fill this in? I mean, are the noes already preset,
20 or did you fill it in to say no?

21 **A** I'm not positive, but I think they are preset.

22 **Q** I'm going to ask you about a different subject.
23 We have looked through some log sheets. They're actually
24 over there to your right. But my question is this, many
25 times on these log sheets, it says "Sight checks 1-50."

JEANA CHAIRESS CPT

1 Are you familiar with that type of entry?

2 **A** Yes, sir.

3 **Q** Was it jail policy or custom to have log sheets
4 just filled in sight check 1 to 50 without being specific
5 as far as when each specific cell was being sight
6 checked?

7 **A** Correct. They normally just put sight check
8 Cells 1 through 50, what time you enter the pod and
9 start, and then what time you finish.

10 **Q** That's the way it was done? Was that by a
11 written policy, or was that just the custom that was
12 happening?

13 **A** To write Cells 1 through 50, I believe it's
14 both.

15 **Q** You think it's in writing?

16 **A** I don't think the policy specifies to write the
17 time of each time -- each cell you look at to write the
18 time.

19 **Q** Are you telling me the policy does not specify
20 to write it down, or does the policy say "Don't write it
21 down"?

22 **A** I don't think it specifies.

23 **Q** Do you think it addresses sight checks at all?
24 Do you think there is a policy that deals with sight
25 checks?

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1 **A** Yes, there is one.

2 **Q** How -- how long does it take to conduct a sight
3 check for any one cell?

4 **A** For any one cell? At least 5 to 10 seconds.

5 **Q** How many cells are there in a pod?

6 **A** 50.

7 **Q** And if it's 10 seconds, that's 500 seconds,
8 isn't it?

9 **A** Uh-huh.

10 **Q** Is that correct?

11 **A** Correct.

12 **Q** And if it's 5 seconds, that's 250 seconds.
13 Right?

14 **A** Yes.

15 **Q** 5 times 50?

16 **A** Yeah.

17 **Q** And if it's 5 seconds, 250, my little
18 calculator says that's 4.17 minutes. And if it's 10
19 seconds each, which is about -- I think you said 500
20 seconds, my calculator says that that's 8.3 minutes. And
21 would it be more likely that some are 5 seconds and some
22 are 10 seconds as opposed to all being 5 seconds and all
23 being 10 seconds?

24 **A** Correct.

25 **Q** So if half of them were 5 seconds and half of

JEANA CHAIRESS CPT

1 them were 10 seconds, trust my math, that'd be 375
2 seconds. According to my calculator, that'd be 6
3 minutes, 6.25 minutes. So it would not be logical that
4 the 1 to 50 sight checks can be done in three minutes.
5 Correct?

6 A Correct.

7 Q And when you said, in answering my question,
8 that it takes 5 to 10 seconds to conduct a sight check,
9 what happens during that 5 to 10 seconds?

10 A You're supposed to look for movement and if
11 they're not moving, sleeping, you make sure that they're
12 breathing.

13 Q And if you're looking in and they look like
14 they're sleeping, I take it sometimes they might have a
15 cover on. And if you don't see any movement, what do you
16 do?

17 A I open the door.

18 Q You said you open the door, but is there a
19 directive or policy from the jail as to what you're
20 supposed to do? Let me start with written policy. Is
21 there a written directive on what you're supposed to do
22 if you don't see movement and they're covered up?

23 A I'm not positive it's -- if it's written, but I
24 wanted to say that it does state that you have them do
25 some sort of movement.

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1 Q Does that mean you have to enter the cell?
2 A No. You can open the door or if you know the
3 individual's name, then you can knock on the door and ask
4 them and then whenever I did it, most of them would move
5 their foot or their hand or wave at me or something to
6 let me know.

7 Q But if all else fails, you have to enter?

8 A Correct.

9 Q Now, what you just told me is what happens
10 during the 5 to 10 seconds. Correct?

11 A Yes.

12 Q After that 5 to 10 seconds is done, you have to
13 go to another cell. Right?

14 A Correct.

15 Q I'm not going to suggest that you have to walk
16 a block to the next cell, but you have to go somewhere,
17 don't you? Don't you have to move from one place to
18 another?

19 A Yes.

20 Q Does that take a little bit more time?

21 A I mean, the -- the doors are pretty close
22 together, so it's just --

23 Q But you have to move from one to another?

24 A Correct.

25 Q At least one second from one door to the other?

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1 **A** Probably.
2 **Q** There's 50 doors. Right?
3 **A** Correct.
4 **Q** 25 of them are on an upper tier and 25 below?
5 **A** Correct.
6 **Q** Sometimes you have to walk up and down the
7 stairs, then, don't you?
8 **A** Correct.
9 **Q** That adds a little time to the process itself,
10 does it not?
11 **A** Correct.
12 **Q** Because, unfortunately, there's just one of you
13 doing it. Right?
14 **A** Correct.
15 **Q** Generally speaking, there are not two rovers on
16 a floor. Correct?
17 **A** Not generally, no.
18 **Q** You have heard -- strike that.
19 Do you think the jail is properly staffed in
20 terms of numbers?
21 **A** No, sir.
22 **Q** It needs more people, doesn't it?
23 **A** Correct.
24 **Q** That's been true for a long time. Right?
25 **A** Correct.

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1 **Q** Back in December of 2018, that was true.

2 Correct?

3 **A** Yes.

4 **Q** Was it also in need of medical personnel back
5 then?

6 **A** I --

7 **Q** In terms of staffing?

8 **A** -- don't know their numbers.

9 **Q** If you don't know, that's fine.

10 **A** I don't.

11 **Q** Did you become aware that in May of 2021, that
12 Turnkey threatened to walk out and quit if they didn't
13 get more budget and staff in?

14 **A** Yes.

15 **Q** You heard that?

16 **A** I did hear that.

17 **Q** Did you ever hear back in 2014 or '15 that
18 Armor sued the County for over \$3 million that they
19 hadn't been paid?

20 **A** I don't recall that one.

21 **Q** If an inmate, detainee, upon medical evaluation
22 is supposed to be placed on suicide watch, how is that
23 communicated, if at all, to the detention staff?

24 **A** For suicide watch, it is communicated because
25 they are placed in a green smock and on specific floor.

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1 **Q** How does that communication happen? How does
2 it -- how does it -- the information get from the medical
3 person to the detention staff?

4 **A** When they take the -- the form that they have,
5 the classifications, it's noted on the form that they're
6 being placed on suicide precaution. And then they find
7 them a cell. And then once that individual is taken
8 upstairs, it's communicated with that officer.

9 **Q** When you say "upstairs," does that mean -- what
10 does that mean?

11 **A** Oh, I'm sorry, from the first floor to the
12 13th floor.

13 **Q** That's from receiving?

14 **A** Correct.

15 **Q** Okay. And then is it verbally communicated --

16 **A** Yes.

17 **Q** -- to the -- to the person on whichever floor
18 it is?

19 **A** Yes. And it's written on their form that they
20 bring up.

21 **Q** In a suicide watch situation, does that
22 increase the number of sight checks?

23 **A** Correct.

24 **Q** And is it 15 minutes?

25 **A** Correct.

JEANA CHAIRESS CPT

1 **Q** If you are conducting a sight check on any one
2 person every 15 -- strike that.

3 If you're not on suicide watch, sight checks
4 are just happening, how often are sight checks supposed
5 to happen?

6 **A** On the regular floors, it's once every hour.

7 **Q** Is six considered a regular floor?

8 **A** Yes.

9 **Q** But 6 could also be a place where somebody
10 would be on suicide watch?

11 **A** No.

12 **Q** Where would suicide watch happen?

13 **A** Suicide watch will -- they were on 12, but
14 they're moved up to 13.

15 **Q** Back in December of 2018, where would that have
16 happened?

17 **A** It would have been 13.

18 **Q** Okay. Either way, it wouldn't have been 6?

19 **A** No.

20 **Q** And if the person is on suicide watch and taken
21 to 13, somebody's going to look in every 15 minutes?

22 **A** Yes. And somebody would be sitting outside the
23 door.

24 **Q** If somebody is on suicide watch, then that
25 person is at least going to be observed four times as

JEANA CHAIRESS CPT

1 much as if they're not on suicide watch?

2 **A** Correct.

3 **Q** And by that, I mean incrementally. As you
4 said, every 15 minutes as opposed to once per hour.

5 **A** Correct.

6 **Q** If upon medical examination, an inmate or
7 detainee, I should say, is labeled to need urgent mental
8 health care -- are you familiar with the concept?

9 **A** Yes, sir.

10 **Q** -- what is supposed to happen?

11 **A** They would go to the mental health floor and
12 they -- the nursing staff should put a task in for them
13 to be seen by mental health.

14 **Q** How long -- well, strike that.

15 **Q** That would typically -- would that typically
16 happen in receiving where that evaluation is done, or is
17 that evaluation done after they go to a floor?

18 **A** It's in receiving.

19 **Q** After that happens and if somebody is
20 designated to have -- need urgent mental evaluation, then
21 that person should go to -- did you say 12?

22 **A** 12 or 13.

23 **Q** Would that have been the case in December of
24 2018 also, to go to one of those two floors?

25 **A** Yes, sir.

JEANA CHAIRESS CPT

1 **Q** Would receiving have kept the person for any
2 amount of time? I don't mean, like, a couple of minutes,
3 but would they keep them for hours before they move them
4 to 12 or 13?

5 **A** I believe they would, just for housing issues.

6 **Q** That it might take hours?

7 **A** Yes.

8 **Q** If the person has the -- if it's labeled or
9 instructed urgent mental health evaluation, whatever they
10 called it, what's their move and what would happen?

11 **A** They would just be placed up on the floor. The
12 sight checks are every 30 minutes. And the medical staff
13 downstairs would have put a task in to be seen by mental
14 health the next day.

15 **Q** If you were checking a person every 15 minutes,
16 the likelihood of seeing a person in physical distress is
17 more likely than if you're just looking at them once
18 every hour. Does that make sense?

19 **A** Yes.

20 **Q** And if you're looking at them once every
21 30 minutes as opposed to once every hour, would it still
22 increase the chances of catching that person who's having
23 physical distress to -- strike that. That's a bad -- bad
24 question.

25 If you're looking in on them once every

JEANA CHAIRESS CPT

1 30 minutes, is the likelihood of seeing a person who's in
2 physical distress, is it -- is that likelihood increased
3 as opposed to if you're just watching them once every
4 hour?

5 **A** Correct.

6 **Q** When you exited the cell where Sindi Spray
7 was -- let's see if it tells us when you left. Does your
8 report tell us when you exited?

9 **A** Not the time, no.

10 **Q** Well, let me -- here's what I want to ask you.
11 At the time you exited, what was her condition? What was
12 Sindi Spray's condition as far as you could tell?

13 **A** From best I can remember, she wasn't breathing.

14 **Q** Okay. Had EMSA arrived when you left?

15 **A** No. When medical staff enters, they take over,
16 and then I called.

17 **Q** But I just want to know if you stayed. I know
18 it says you had to go do some other stuff, but EMSA
19 hadn't made it there by the time you physically left the
20 cell? And it's not a trick question. I just want to
21 know if they were there or not.

22 **A** Not the time when she took over, the nursing
23 staff. Excuse me.

24 **Q** She, Nurse Shirley Reisch?

25 **A** Yes.